

## Valdez, Heather

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**From:** Jones, Toni  
**Sent:** Friday, February 14, 2014 6:47 PM  
**To:** Thomas, Brad C  
**Cc:** Reile, Matthew R; kindred@aoga.org; Dave Newsad; Cozzie, David; Schell, Bob; Mia, Marcia; Johnson, Steffan; Valdez, Heather; Hedgpeth, Zach; Pavitt, John; Versace, Paul; Parker, Barrett  
**Subject:** Revised SRI Protocol - EPA Comments  
**Categories:** Pogo FOIA

Hi Brad,

Below please find comments based on a cursory review of the revised testing protocol. Let me know if you'd like to have a quick call next week to follow-up.

1. According to our Audit Program website (available at <http://epa.gov/ttn/emc/email.html#audit>), audit materials exist for HCl; Cd, Pb, and Hg; dioxins / furans; SO<sub>2</sub>; and NO<sub>x</sub> using the methods specified. Please include use of these audit materials in the testing program.
2. According to our Electronic Reporting Tool website (available at <http://www.epa.gov/ttn/chief/ert/index.html>), all of the methods specified are available for electronic reporting. Use of the ERT should be required for these methods in the testing program. Instructions for ERT installation and use are included at the website.
3. Since the Phase II of testing is no longer expected, please explain how variability across the category will be demonstrated (just one test from one unit in each category would provide just one value per batch). Since our UPL calculation requires at least 3 values, there should be results from at least 3 tests from each category to appropriately determine if any variability exists across the category. This concern has been raised previously, so please ensure that the revisions to the testing protocol clarify that individual run values should be included, though we also want aggregate averages that represent batch combustion where appropriate (some are semi-continuous feed small-batch, so testing across a number of batch cycles makes sense there).
4. Page 7, Table 2 – Why are there two lines for Method 29 with different minimum run durations?
5. We note there is no analysis (comparable to that specified in Table 9) for ash. We recommend starting with clean units, collecting ash samples at the end of testing, and having them analyzed.
6. Page 6, Section 1.1 - We suggest requiring testing to begin with the first waste charge rather than when the auxiliary fuel warm-up period begins. Please pay particular attention to how much of the burn down time is included in the testing period. For units with an extended burn down, the burn down could encompass an entire test run or more if the whole burn down time is included in the test period. Emissions from a test run that did not include any waste charging would likely be significantly lower.
7. Page 8 – Has consideration been given to how ambitious these simultaneous testing approaches can be against the physical realities of access to the stack at these incinerators? At Pogo Mine, for instance, a man lift was necessary to access the stack. Switching ports was very difficult and simultaneous testing would be a serious challenge.
8. General Comment – One of the major difficulties encountered at Pogo Mine was the extremely high stack gas temperatures. Testers used a one-piece quartz nozzle to withstand the high temperatures, but then experienced repeated nozzle breakage issues when the nozzle was removed from the hot stack into the cold ambient air (40 degrees). Consider adding language to include mitigative measures, such as gradual removal of glass sampling probes from the stack to allow slower cooling and hopefully minimize breakage.
9. Combustion temperature and pressure measurement device calibration could also be assessed readily by use of a redundant sensor.
10. We recommend revising the narrative of the document to address the apparent “looseness” of the protocol. More specifically, use of “should” and “may,” as well as “recommend” leave ambiguity in the

protocol. Consider revising the document to state what is required; absent that, we recommend including language that spells out the consequences of not following recommended practices (i.e., "If the data are not collected in this manner, they will not be used.")

Kind regards,  
Toni

Toni Wyche Jones, EI | Fuels & Incineration Group | Sector Policy & Programs Division - Mail Code E143-05 | Office of Air Quality Planning & Standards | U.S. Environmental Protection Agency | Research Triangle Park, NC 27711 | Phone: 919-541-0316 |

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**From:** Jones, Toni  
**Sent:** Thursday, February 06, 2014 5:25 PM  
**To:** 'Thomas, Brad C'  
**Cc:** Reile, Matthew R; [kindred@aoga.org](mailto:kindred@aoga.org); Dave Newsad; Cozzie, David; Schell, Bob; Mia, Marcia; Johnson, Steffan; Valdez, Heather; Hedgpeth, Zach; Pavitt, John; Versace, Paul; Parker, Barrett  
**Subject:** RE: SRI Protocol & Feb 4 Meeting Agenda

Hi Brad,  
As promised, I'm responding to this email as a follow-up to the phone call we just had for the benefit of those on the cc list. We will provide comments on the testing protocol via email by the end of next week. We can schedule a teleconference to discuss the testing protocol comments (if we find that email exchange is insufficient).

Kind regards,  
Toni

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**From:** Thomas, Brad C [<mailto:Brad.C.Thomas@conocophillips.com>]  
**Sent:** Thursday, February 06, 2014 1:54 PM  
**To:** Jones, Toni  
**Cc:** Reile, Matthew R; [kindred@aoga.org](mailto:kindred@aoga.org); Dave Newsad; Cozzie, David; Schell, Bob; Mia, Marcia; Johnson, Steffan; Valdez, Heather; Hedgpeth, Zach; Pavitt, John; Versace, Paul; Parker, Barrett  
**Subject:** RE: SRI Protocol & Feb 4 Meeting Agenda

Toni:

To add to the email I sent earlier today, we don't object to your plans below but we really need to have a protocol version for use in getting contractors lined up to do the testing. We left the meeting understanding we'd get comments within the week and hope we can still get those on that schedule.

If we wait until into march to line up contractors, including defining their scopes of work, we may lose the ability to schedule them this summer. So can you please move item 1 below to a faster track?

Brad Thomas  
ConocoPhillips Alaska  
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**From:** Jones, Toni [<mailto:Jones.Toni@epa.gov>]

**Sent:** Thursday, February 06, 2014 5:21 AM

**To:** Thomas, Brad C

**Cc:** Reile, Matthew R; [kindred@aoga.org](mailto:kindred@aoga.org); Dave Newsad; Cozzie, David; Schell, Bob; Mia, Marcia; Johnson, Steffan; Valdez, Heather; Hedgpeth, Zach; Pavitt, John; Versace, Paul; Parker, Barrett

**Subject:** [EXTERNAL]RE: SRI Protocol & Feb 4 Meeting Agenda

Brad,

I hope you all had a safe and comfortable trip back home. I, again, apologize for leaving the meeting a few minutes early – thank you for understanding.

I've scheduled an EPA internal meeting for follow-up discussions regarding 1) the testing protocol, 2) the small remote incinerator definition, and 3) the administrative procedure for potential revision of the limits. To allow time to review and comment on the revised testing protocol, that meeting is scheduled for February 26 at 2:30 pm. We (SRI and EPA) should plan to schedule a phone conference shortly afterwards.

Kind regards,

Toni

Toni Wyche Jones, EI | Fuels & Incineration Group | Sector Policy & Programs Division - Mail Code E143-05 | Office of Air Quality Planning & Standards | U.S. Environmental Protection Agency | Research Triangle Park, NC 27711 | Phone: 919-541-0316 |

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**From:** Thomas, Brad C [<mailto:Brad.C.Thomas@conocophillips.com>]

**Sent:** Friday, January 31, 2014 3:37 PM

**To:** Jones, Toni

**Cc:** Reile, Matthew R; [kindred@aoga.org](mailto:kindred@aoga.org); Dave Newsad

**Subject:** SRI Protocol & Feb 4 Meeting Agenda

Toni:

Attached are the agenda for Tuesday's meeting as well as the latest protocol we'll work from. The protocol was sent to you previously so it should look familiar. I look forward to seeing y'all down there. Hopefully it'll be southern warm weather by the time we get there.

Brad Thomas  
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